



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



314000

REPLY TO THE ATTENTION OF: SR-6J

VIA ELECTRONIC MAIL AND USPS

Friday, July 20, 2007

Jennifer Hale
Environment Health & Safety, WTC 2G2
P.O. Box 9777
Federal Way, WA 98063-9777

RE: Plainwell Mill, Operable Unit #7, Allied Paper/Kalamazoo River Site
Plainwell Mill Bank Reconnaissance and Design Investigation
Comments: 07/16/2007 Weyerhaeuser Project Memorandum

Dear Ms. Hale

On July 16, 2007, RMT, Inc. provided a *Weyerhaeuser Project Memorandum: Plainwell Mill Bank Reconnaissance and Design Investigation* (WPM) on behalf of Weyerhaeuser to Region 5. Region 5 is providing comments and recommendations regarding the draft WPM.

General Comment:

- A. Region 5 believes it imperative to the maintenance of good relations between all parties, that the City of Plainwell understand the scope of Weyerhaeuser's proposed work. The City may be under the impression that this work will be the final cleanup for the mill banks. Unless through confirmation sampling Weyerhaeuser is able to establish that it has achieved remedial standards, this emergency work may not be the final cleanup action on those banks. If data indicate that areas of the banks are contaminated with PCBs over 50 ppm after Weyerhaeuser's emergency work, additional response work is particularly likely. After the completion of your analysis of the data gathered this week (July 17 through July 20, 2007) a discussion should take place between Region 5, Weyerhaeuser, Michigan Department of Environmental Quality (MDEQ) and the City of Plainwell to discuss Weyerhaeuser's proposed actions. Also, future submissions should be provided to the City of Plainwell's City Manager, Erik Wilson, or other contact chosen by the City of Plainwell.
- B. Region 5 currently **does not** consider the 12th Street Landfill to be a viable option for disposal, temporary or permanent, of excavated material from this or any future action. Please take this into consideration during the design phase of this action and future actions.

Specific Comments

1. Page 1 of 9 - ¶ 2 - RMT states that future response activities on the Kalamazoo River are "expected to include removal of additional downstream dams." It should be made clear that Region 5 has not made any determination whatsoever with regard to future response activities downstream of the Plainwell Dam. Partial dismantling of the Plainwell Dam was an agreed part of the time-critical removal action at the impoundment area only after it was determined that effective removal of sediments would be facilitated by partial dismantling of the dam.
2. Page 1 of 9 - ¶ 3 - The memo states that the proposed work represents a modification to the SOW for the Plainwell Mill RI/FS. It is currently unclear if this statement is accurate. Additionally, Weyerhaeuser should be aware that it may be obligated to conduct further investigation of contamination, including sampling for PCBs, on the banks under the terms of the Weyerhaeuser consent decree.
3. Page 3 of 9 – First Bullet – The memo states that "Area A is expected to experience increased erosion due to alterations of the Plainwell Mill impoundment." A source should be provided for this assertion.
4. Table 1 – Step 1 – Identifying primary decision-makers - The Region 5 RPM should be included as a primary decision-maker.
5. Table 1 – Step 1 – Specifying available resources and deadlines – Historical data as well as the United States Department of Agriculture (USDA) and United States Geological Society (USGS) reports cited in your June 28, 2007 letter should be listed as sources for data.
6. Table 1 – Step 2 – Identify the principal study questions – Delete the following, "and could the residuals pose and imminent threat to human health and the environment after dam removal?" The investigation outlined in the WPM does not provide the necessary information to determine if residuals on the banks pose a threat to human health or the environment.
7. Table 1 – Step 2 – Define alternative actions – Alter the text to reflect the various amounts and locations of residuals that will be excavated, as determined by the results of this investigation.
8. Table 1 – Step 2 – Develop decision statement – Alter the text to reflect the changes made in the Comment 6 and Comment 7.
9. Table 1 – Step 4 – Define the temporal boundary – Applicability of the information gathered during this investigation should be limited to the present through the deconstruction of the Plainwell Dam.

10. Table 1 – Step 4 – Define the scale of decision-making – “define potential risk” should be deleted from the text because the investigation outlined in the WPM does not provide the necessary information to determine if residuals on the banks pose a threat to human health or the environment.

11. Table 2 – Surface Soils – Other Areas: Between Areas A and B – 1 – Delete “with PCBs >4mg/kg (four locations)” from the text. This statement can lead readers to believe that analytical samples are being taken.

Thank you for your attention to this matter. Please do not hesitate to call me at 312.886.1434, should you have any questions related to the task.

Sincerely,



Sam Chummar, Remedial Project Manager
U.S. EPA Region 5
Superfund Division – Remedial Response Branch #1
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cc: Eileen Furey, C-14J
James Saric, SR-6J
Michael Berkoff, SR-6J
Paul Bucholtz, MDEQ